

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

BOBBY WALKER,

Plaintiff,

v.

WORLD CHAMPIONSHIP
WRESTLING, INC., TURNER
SPORTS, INC., and
TURNER BROADCASTING
SYSTEM, INC.,

Defendants.

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) CIVIL ACTION FILE

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) NO. 1:00-CV-0367-CC
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AFFIDAVIT OF PAUL ORNDORFF

PAUL ORNDORFF, who having personally appeared before the undersigned officer duly authorized to administer oaths and having been first duly sworn according to law, deposes and states the following:

1. My name is Paul Orndorff. I am of majority age, and I give this testimony of my own free will. I have personal knowledge of and am competent to testify to the facts stated herein. The facts stated herein are true and correct.

2. I first began providing services to Universal Wrestling Corporation (f/k/a World Championship Wrestling, Inc. and hereinafter referred to as "WCW") in 1994 as a professional wrestler. After working with the organization in various capacities, I eventually became the Director of the Power Plant, WCW's training facility.

3. As part of my duties as the Director of the Power Plant, I worked with WCW's professional wrestlers and trainees. At times, members of the booking committee and I would discuss my opinion with respect to wrestling and training talent. Based on my experience in the

wrestling industry and at WCW, factors to be considered in determining which wrestlers and/or trainees will be well-received by wrestling audiences include the wrestler's crowd appeal, stage presence, charisma, uniqueness, wrestling ability and physique. In light of these factors, I periodically evaluated wrestlers and trainees at the Power Plant, to determine how well they were progressing.

4. When I became the Director of the Power Plant Facility, Bobby Walker had already been signed to an independent contractor agreement with WCW. While training at the Power Plant, Mr. Walker lacked the charisma, uniqueness and excitement of WCW's more popular wrestlers; however, I believed, at the time that I first became familiar with Mr. Walker as a professional wrestler, that he had the potential to develop into a fairly successful wrestler. Despite my initial impressions, Mr. Walker never developed the stage presence, excitement, charisma and uniqueness necessary to generate significant crowd interest.

5. Mr. Walker also failed to master his "signature move." Wrestlers often used unique "signature moves" to "defeat" their opponents at the end of wrestling matches. Mr. Walker's signature move involved walking on the ropes of the wrestling ring and then attacking his opponent from the ropes. Although this is a unique concept, Mr. Walker often fell from the ropes.

6. In early 2000, in an attempt to provide Mr. Walker with additional wrestling opportunities, Kevin Sullivan, the head of the Booking Committee at the time, developed a new storyline involving Mr. Walker's character. In fact, Mr. Sullivan contacted Mr. Walker and asked him to work with a tag team partner to prepare himself for use on WCW's upcoming television shows. In an attempt to prepare for this new effort, Mr. Walker appeared for a few days in a row at the Power Plant to train with me and to work with Harold Hogue, his new

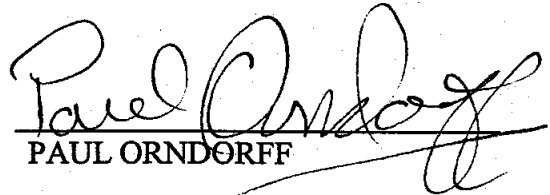
partner-to-be. However, Mr. Walker's wrestling efforts were poor, his timing was off, he was sloppy, he did not try hard, and he lacked excitement.

7. After spending a few days at the Power Plant and showing no significant improvement, Mr. Walker unilaterally stopped coming to the Power Plant to train.

8. Upon opting not to return to the Power Plant, Mr. Walker made no additional efforts to pursue wrestling and/or training opportunities with WCW. At the time that he stopped training with me at the Power Plant, he still had not developed the level of excitement, stage presence, uniqueness, and crowd appeal of WCW's more popular wrestlers.

FURTHER AFFIANT SAYETH NAUGHT.

This 16th day of December, 2002.


PAUL ORNDORFF

Sworn to and subscribed
Before me this 16th day
of December, 2002.


Notary Public

My Commission Expires:

Notary Public, DeKalb County, Georgia
My Commission Expires Feb. 10, 2004